

***Exhibit U***

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants,

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

VIDEO-RECORDED  
DEPOSITION UPON ORAL  
EXAMINATION OF DELBERT  
HIEBERT

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Plaintiffs,

Cause No.  
CV 20-59-BLG-SPW

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants.

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**Delbert Hiebert**

1 Q. Anything else?

2 A. Of course the demeanor is gentle, kind,  
3 loving. You know, you're -- you're handling  
4 children in that case, you know.

5 Q. And any specific teaching or training on  
6 interviewing children who are victims of child sex  
7 abuse?

8 A. There again, we will call the branch and  
9 ask them, what do we do.

10 Q. And the branch would tell you what to do.

11 A. Yeah, they'll give us legal advice, you  
12 know. And, you know, handling a child who's been a  
13 child molestation victim, of course we have to be  
14 very gentle, and, you know, don't be hammering  
15 them, you know, for -- or accusing them. You know,  
16 you never accuse someone who comes forward of  
17 lying. You assume the best, that they're coming  
18 through with good motive, you know.

19 Q. And how did you learn to do that, to take  
20 that tack in those situations?

21 A. Learn it. It's part of being a good  
22 Elder, you know. You just know how to treat  
23 people. You treat people kindly and gently and  
24 tactfully and to try and get the truth in the most  
25 humane way you can, you know. But you've got to

**Delbert Hiebert**

1 her husband had done.

2 MR. MAPLEY: Objection.

3 BY MR. STEPANS:

4 Q. All right. Please go ahead.

5 A. That's all I had to say.

6 Q. Okay. When -- is it your understanding  
7 that -- strike that.

8 We were talking earlier -- Del, I kind of  
9 wanted to circle back. We were talking earlier  
10 about when a report or an accusation, an allegation  
11 of child abuse, and specifically child sex abuse,  
12 comes to the attention of an Elder, you -- you  
13 indicated the process that you go through.

14 And one thing you did not talk about in  
15 there is whether or not there was any reporting or  
16 consideration of reporting those events to law  
17 enforcement. Is that a part of the evaluation when  
18 the Elders meet?

19 A. We get our legal advice from the branch,  
20 the legal desk there. Whatever they would tell us  
21 to do, that's what we would do.

22 Q. Okay. So you wouldn't have -- you didn't  
23 have any discretion in making a decision to discuss  
24 calling law enforcement about these allegations?

25 A. I don't know if I can answer that. I

**Delbert Hiebert**

1 would -- I would -- in my recollection, this stuff  
2 had already been reported to law enforcement.

3 Q. Understood. And I want to sort of remove  
4 us from these things that are many years after the  
5 fact going back to when -- just talking about the  
6 process of a judicial committee.

7 A. Right.

8 Q. And so would that be a discussion that the  
9 judicial committee would have, whether to call law  
10 enforcement?

11 A. Our discussion would only be to what --  
12 what advice we got from the legal department in  
13 New York. They may tell us, this has to be  
14 reported, you know, that we would go with whatever  
15 we're advised to do. We're spiritual advisors.  
16 We're not lawyers or policemen, you know. We would  
17 do what we're told by the legal department.

18 Q. And you'd follow their directions.

19 A. Right. That's what we're -- that's what  
20 we're to do.

21 Q. And so let's say you encountered a  
22 situation where you thought it would be reasonable  
23 to call law enforcement personally. Would you feel  
24 like you could do that, or would you need direction  
25 from legal before you decided?

**Delbert Hiebert**

1           A.     I don't know. I'd have to think about  
2     that and get advice. You'd have to get legal  
3     advice on that.

4           Q.     So you wouldn't make your own decision  
5     about whether or not to call law enforcement.

6           A.     I would make the decision to follow  
7     direction, the direction I got from the branch.  
8     The branch would probably say, this needs to be  
9     reported, and then there would be a report made. I  
10    wouldn't run ahead on my own.

11          Q.     Oh, I wanted to, yeah, touch -- touch one  
12    more thing on this [Exhibit 17](#). Sitting here today,  
13    do you have any -- think how to ask you this  
14    question. Is it your -- did you believe Tracy, I  
15    guess, at the time that this call happened?

16          A.     I had no reason not to believe her. Yeah,  
17    I would say I believed her. And I felt terrible  
18    for her.

19          Q.     And since then, have you come to  
20    understand whether or not what Tracy was saying  
21    is true based on other corroborative information?

22          A.     Well, you know, I -- when I got off the  
23    phone with her, as you can see, I made this letter  
24    up, and I started phoning around to find out what  
25    others had to say. And I wrote it all down to pass